

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Jenee K. Ciccarelli, Esq. (JC/0693)  
Ciccarelli Law, PC  
47 Park Ave., Suite 304  
West Orange, New Jersey 07052  
Phone 973-737-9060  
Fax 973-619-0023  
[jenee@jc-lawpc.com](mailto:jenee@jc-lawpc.com)  
Attorney for Debtor

In Re:

Doris Pilgrim,  
Debtor.

**Chapter 13**

Case No. 20-13717

Honorable Vincent Papalia

Hearing: 7/2/2020

**NOTICE OF OBJECTION AND  
REQUEST TO RECLASSIFY  
CLAIM NO. 2**

**ORAL ARGUMENT REQUESTED  
ONLY IF OPPOSITION IS FILED**

TO:

Marie-Ann Greenberg  
Chapter 13 Standing Trustee  
30 Two Bridges Rd  
Suite 330  
Fairfield, NJ 07004

LMC Fund I, LLC  
2332 Frankford Avenue  
Philadelphia, PA 19125

The debtor has filed papers with the Court for an Order objecting to your proof of claim and reclassifying your proof of claim from secured to unsecured, and other such relief as the Court may deem appropriate.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to reclassify your claim, or if you want the Court to consider your views on the motion, then you or your attorney must:

File a written response in opposition to this motion explaining your position(s) at least 7 days prior to the hearing date and send it to:

Clerk  
United States Bankruptcy Court  
50 Walnut Street  
Newark, NJ 07102

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before 7 days from the date of this notice.

You must also mail a copy to:

Jenee K. Ciccarelli, Esquire  
47 Park Ave., Suite 304  
West Orange, NJ 07052

Marie-Ann Greenberg  
Chapter 13 Standing Trustee  
30 Two Bridges Rd  
Suite 330  
Fairfield, NJ 07004

Pursuant to D.N.J. LBR 9013-2(a) et seq., if you wish to contest the within motion, you must file with the Office of the Clerk of the Bankruptcy Court, responding papers stating with particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is enclosed with this Motion.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: June 11, 2020

/s/Jenee K. Ciccarelli  
Jenee K. Ciccarelli, Esq.  
Attorney for Debtor